

EXHIBIT A

From: [Obermeier, Stephen](#)
To: [Vincent Russo](#)
Cc: [Doug Chalmers](#); [Zehr, Brandis](#); [Toner, Michael](#); [Carey Miller](#); [Ed Bedard](#); [Gene Schaerr](#); [Brian Field](#); [cbartolomucci@schaerr-jaffe.com](#); [evaughan@law.ga.gov](#)
Subject: RE: Amended Complaint
Date: Wednesday, February 2, 2022 6:31:13 PM
Attachments: [image002.png](#)

From External Sender

Hi Vincent,

Thank you for confirming acceptance of service on behalf of Georgians First. We are in the process of completing service on Governor Kemp in his personal capacity.

We do not believe there is any need to jointly propose a new schedule to the Court. As you know from attending the hearing on Monday, Judge Cohen was very clear that Defendants have until close of business on Thursday, February 3, to supplement their Response, so we believe it would be inappropriate to propose a further extension. We also think that additional briefing is unnecessary in this case given that a.) the preliminary injunction motion sought relief against Governor Kemp and Georgians First (through Governor Kemp); b.) Governor Kemp has already filed an opposition brief; and c.) Georgians First effectively filed a sur-reply on Saturday.

Thanks,

Steve

From: Vincent Russo <vrusso@robbinsfirm.com>
Sent: Wednesday, February 2, 2022 2:55 PM
To: Obermeier, Stephen <SObermeier@wiley.law>
Cc: Doug Chalmers <dchalmers@chalmersadams.com>; Zehr, Brandis <BZehr@wiley.law>; Toner, Michael <MToner@wiley.law>; Carey Miller <carey.miller@robbinsfirm.com>; Ed Bedard <Ed.Bedard@robbinsfirm.com>; Gene Schaerr <gschaerr@schaerr-jaffe.com>; Brian Field <bfield@schaerr-jaffe.com>; cbartolomucci@schaerr-jaffe.com; evaughan@law.ga.gov
Subject: RE: Amended Complaint

External Email

Steve,

Thanks again for your email yesterday. I will be out of the office for most of the day, but I can confirm that we can accept service on behalf of Georgians First Leadership Committee. However, we are not authorized to accept service on behalf of Governor Kemp in his personal capacity. At this time, we have not been retained by the Governor personally and we only represent Georgians First.

This raises a related issue that we wanted to discuss with you. We think there are a number of procedural issues with the case and the preliminary injunction motion as it currently stands. The Amended Complaint has added Georgians First and Governor Kemp in his personal capacity as Defendants, but Plaintiffs' preliminary injunction motion is currently only directed against—and only seeks relief from—the State Defendants. Moreover, the newly added Defendants have a right to be heard both as parties to the briefing and in a hearing.

At this juncture, we think the parties should jointly propose a schedule to the Court that would include a renewed motion, briefing on the renewed motion, and a hearing on the renewed motion. Judge Cohen made clear that he does not want this to drag out, so I would like to raise this issue with the Court either today or early tomorrow. It is imperative that our client and Governor Kemp (in his personal capacity) have a meaningful opportunity to be heard before the Court, and prefer to work together on a schedule that makes sense for everyone. I have copied counsel for the State Defendants also.

We look forward to hearing from you.

Thanks,

Vincent

ROBBINS

Vincent R. Russo

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From: Obermeier, Stephen <SObermeier@wiley.law>

Sent: Tuesday, February 1, 2022 5:24 PM

To: Vincent Russo <vrusso@robbsfirm.com>

Cc: Doug Chalmers <dchalmers@chalmersadams.com>; Zehr, Brandis <BZehr@wiley.law>; Toner, Michael <MToner@wiley.law>; Josh Belinfante <Josh.Belinfante@robbsfirm.com>; Carey Miller <carey.miller@robbsfirm.com>; Ed Bedard <Ed.Bedard@robbsfirm.com>

Subject: RE: Amended Complaint

From External Sender

Hi Vince,

Following up, although you should have already received these via PACER, attached are the amended complaint, a redline of the amended complaint, and a summons for Governor Kemp and Georgians First.

Thanks,

Steve

From: Obermeier, Stephen

Sent: Tuesday, February 1, 2022 3:56 PM

To: 'Vincent Russo' <vrusso@robbinsfirm.com>

Cc: 'Doug Chalmers' <dchalmers@chalmersadams.com>; Zehr, Brandis <BZehr@wiley.law>; Michael Toner (mtoner@wiley.law) <mtoner@wiley.law>; Josh Belinfante <Josh.Belinfante@robbinsfirm.com>; Carey Miller <carey.miller@robbinsfirm.com>; Ed Bedard <Ed.Bedard@robbinsfirm.com>

Subject: Amended Complaint

Hi Vince,

We will be filing the Amended Complaint shortly. Will you accept service for Georgians First? Also, we're adding Governor Kemp in his personal capacity. Would you be willing to accept service on behalf of Governor Kemp in his personal capacity?

Thank you,

Steve



Stephen J. Obermeier
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